

EXHIBIT 2



January 17, 2025

By Electronic Mail

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Boston, Massachusetts 02109

Re: Sunco Timber (Kunshan) Co. Ltd. v. Linda Sun, et. al.
Civil Action No. 1:22-cv-10833

Dear Michele and Ted,

Thank you for your e-mails following up on the scheduling of the depositions in this matter. With respect to the deposition notices by Defendants, Yun is communicating with our client to determine who is currently employed by Plaintiff and if the deponents are available on the dates as noticed. We will update you as soon as we have confirmation. We also have issues with the legality of taking depositions in China that we are seeking to work through. We anticipate that Guoqing Wu will be designated as the most knowledgeable person and will confirm with you accordingly following Yun's discussion with our client. In determining the most knowledgeable person, please provide us with a deposition notice identifying the specific subject areas the s/he will be testifying upon. Please note that we will be updating our 30(b)(6) deposition notices as well.

With respect to the depositions noticed by Plaintiff, will David Sun be designated at the 30(b)(6) witness for Infinity Wood Products, LLC, Sunco, Inc., Eastman St. Distributors, LLC and Eastman St. Woodworks, Inc.? If yes, we can combine his deposition and significantly reduce the number of depositions. Please note that we also need for Defendants to complete their document production well in advance of these depositions. Michele, you represented that the production is a rolling production. Please identify what documents remain to be produced and when you anticipate producing them.

We are available for the taking of the depositions of David Sun, Shillock Yuan-Sun, Catherine Li and Linda Sun on the following dates:

Linda Sun, **February 20, 2025**
Shillock Yuan-Sun, **February 24, 2025**
Catherine Li, **February 27, 2025**
David Sun (individually and as 30(b)(6)), **March 7, 2025**

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Please confirm that these dates work for your clients and we will reissue our Notices of Deposition.

Sincerely,
CUTLER & WILENSKY LLP

/s/Timothy K. Cutler

Timothy K. Cutler

TKC/rq

cc: Connie C. Dai, Esq.
Yun Cheng, Esq.